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EX PARTE OR LATE FILED

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Vice President-Federal Regulatory

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February 22, 2000

FEB 22 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

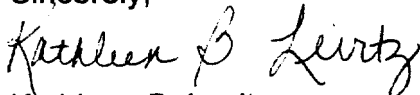
Re: Written Ex Parte in CC Docket No. 98-121
and CC Docket No. 99-295

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Claudia Fox, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division, with copies of that ex parte going also to William Agee and Jake Jennings. That ex parte consists of a copy of KPMG's Exception 15 that KPMG filed with the Georgia Public Service Commission on February 8, 2000, in connection with KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. Included with the Exception is BellSouth's response to it. Also included in the ex parte is a copy of an Amended BellSouth Response to Exception 2. All these documents were filed with the Georgia Commission on February 17, 2000.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, we are filing two copies of this notice and that written ex parte presentation. Please associate this notification with the record in each of those proceedings.

Sincerely,



Kathleen B. Levitz
Attachment

cc: Claudia Fox (w/o attachment)
William Agee (w/o attachment)
Jake Jennings (w/o attachment)

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February 22, 2000

WRITTEN EX PARTE

Ms. Claudia Fox
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Common Carrier Bureau
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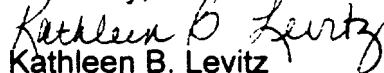
Re: CC Docket No. 98-121 and CC Docket No. 99-295

Dear Ms Fox:

Attached is a copy of KPMG Exception 15 arising during KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS and BellSouth's response to the exception. Also attached is an Amended BellSouth Response to Exception 2. Both documents were filed with the Georgia Public Service Commission on February 17, 2000. I am sending these filings to you in response to the request that BellSouth share with you documentation related to the third party-testing program currently underway in Georgia. If you have any questions after reviewing the documents, please call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record in those dockets.

Sincerely,


Kathleen B. Levitz

Attachments

cc: William Agee
Jake Jennings



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February 17, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
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FEB 17 2000

EXECUTIVE SECRETARY
G.P.S.C.

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 15 along with BellSouth's response for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record



KPMG LLP, KPMG LLP, a limited liability partnership
a member of KPMG International, a Swiss association



EXCEPTION 15

BellSouth Georgia OSS Testing Evaluation

Date: February 4, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Normal and Peak Volume Tests (M&R-3 & M&R-4). This exception is described below.

Exception:

Under certain circumstances, BellSouth's ECTA gateway cannot adequately create trouble tickets.

BellSouth's ECTA Gateway is designed to allow CLECs to enter trouble tickets into either one of two BellSouth OSS M&R systems, LMOS (for POTS) and WFA (for specials). During the course of volume testing, KPMG discovered that some attempts to create trouble tickets produced an ECTA error message with the codes "source=4" and "reason=770". This error occurred in 10 out of 740 total attempted creates (1.4%). Investigation of this error with representatives of BellSouth Applied Technologies revealed that this error occurs when LMOS assigns a trouble ticket identification number that already exists in the ECTA Gateway's database of trouble ticket identification numbers.

When this error occurs, a trouble ticket is actually created in LMOS but the CLEC is unable to view information in the trouble ticket, modify or cancel the trouble ticket, or receive status updates using the ECTA Gateway. This trouble report is not recorded in, or accessible through, ECTA, and the CLEC is not able to track the trouble ticket through any electronic means.

Impact

In order to track a trouble ticket generated under the scenarios described above, a CLEC must call BellSouth to have the ticket canceled and then resubmit the ticket through ECTA. Such a requirement leads to increased operating costs associated with trouble ticket processing.



February 8, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Normal and Peak Volume Tests (M&R-3 & M&R-4). This exception is described below.

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BellSouth's ECTA Gateway is designed to allow CLECs to enter trouble tickets into either one of two BellSouth OSS M&R systems, LMOS (for POTS) and WFA (for specials). During the course of volume testing, KPMG discovered that some attempts to create trouble tickets produced an ECTA error message with the codes "source=4" and "reason=770". This error occurred in 10 out of 740 total attempted creates (1.4%). Investigation of this error with representatives of BellSouth Applied Technologies revealed that this error occurs when LMOS assigns a trouble ticket identification number that already exists in the ECTA Gateway's database of trouble ticket identification numbers.

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Impact

In order to track a trouble ticket generated under the scenarios described above, a CLEC must call BellSouth to have the ticket canceled and then resubmit the ticket through ECTA. Such a requirement leads to increased operating costs associated with trouble ticket processing.

BellSouth Response

Initially the ECTA active database retained trouble ticket transaction information for 30 days. (Part of the daily system maintenance routine is to purge 'closed' trouble report data for all tickets that have been closed for 30 days.) Once the Manager receives the

"close" AVC there is no practical reason for ECTA to retain this information (log files provide usage data, etc.).

LMOS assigns Trouble Ticket numbers using a complex algorithm and only a subset of the available numbers are used in an LMOS region (i.e. approximately 160,000 unique numbers). When a given trouble ticket is closed in LMOS, LMOS knows that the given trouble ticket number is now available for reuse. (Note: due to the methodology LMOS uses to assign TTNs, it is possible for an old report to be closed one day and that TTN assigned to a new report on the same day.)

To minimize the probability that a newly created LMOS trouble report will have the same TTN as an old report stored in the ECTA database, the ECTA purge interval has been reduced to 2 days. Note: if the Manager has problems and they did not receive all the AVC transactions, they can 'get' the missing data directly from the ECTA database as part of their recovery process. If this data is purged daily (which would increase the probability of not getting conflicting TTNs), and a Manager could not find missing data (because they had problems), they would be calling the BRMC for update information (generating unnecessary work for the Center). The two-day purge window provides sufficient time for the Manager to recover from any problems while significantly reducing the probability of obtaining TTN conflicts. (Note: this purge parameter is an adjustable figure (by Manager) and could be changed to one day if needed with minimal effort.)

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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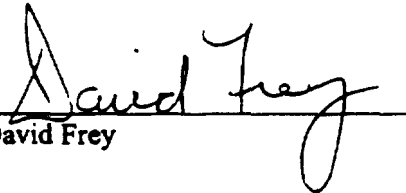
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This 17th day of February 2000.


David Frey

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February 17, 2000

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47 Trinity Avenue SW, Room 520
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RECEIVED

FEB 17 2000

EXECUTIVE SECRETARY
G.P.S.C.

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of BellSouth's amended response to Exception 2 for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record



KPMG LLP, KPMG LLP's U.S. limited liability partnership, is
a member of KPMG International, a Swiss association.



February 11, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Change Management Practices Review (CM-1).

Exception:

BellSouth's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.

Based on interview sessions and documentation reviews conducted as part of the CM-1 Test, KPMG has observed that BellSouth's processes for introducing changes to electronic interfaces, business rules, and technical specifications do not include fully defined and published change management processes and intervals for items that affect Competitive Local Exchange Carriers (CLECs). BellSouth's published change management process should define intervals for both BellSouth- and CLEC-initiated changes, including changes that stem from both system enhancements (features) and corrections of defects.

Key elements of a comprehensive change management process include:

- A. Multi-dimensional classification system for changes.
- B. Type (source)
- C. Severity
- D. Event category (interface, documentation, procedures)
- E. Defined intervals for all classifications.
- F. Opportunity for CLEC testing of changes.

Under current methods and procedures, documentation reflecting new interface fields, field formats, and business rules or procedures can be introduced and made effective the day of release. In September and October 1999, multiple on-line CLEC customer guide updates were released. In each case listed below, the notification interval was inadequate to allow CLECs to assess the operational impact of the change and make corresponding adjustments.

Document Title	Posting Date	Notification Date	Notification Interval
BellSouth Guide to Interconnection Issue 8E	September 22, 1999	None	0 days
LEO Implementation Guide (Volume 1), Issue 7K	November 1, 1999 ¹	None	4 days
LEO Implementation Guide (Volume 4), Issue 7F	October 28, 1999	None	0 days
Local Exchange Navigation System (LENS) User Guide, Issue 7B	September 9, 1999	None	0 days
Collocation Handbook, Issue 8	September 16, 1999	None	0 days
Local Number Portability Ordering Guide for CLECs, Issue 1B	October 27, 1999	None	0 days
Telecommunications Access Gateway (TAG), Release 2.2.0.5	October 30, 1999	October 28, 1999	2 days

Impact:

In the absence of a comprehensive change management process that includes defined intervals for change events, BellSouth's current practices could adversely affect CLEC business operations.

Examples of how CLEC operations could be affected include:

- A. Workforce management disruptions resulting from emergency allocation of CLEC personnel to address a required change(s) immediately.
- B. Order entry errors resulting from an inability to appropriately train CLEC order entry personnel in advance of a change. An increased frequency of errors results in higher order fallout rates that can lengthen the total intervals for service installations.
- C. Reduction in customer satisfaction due to an inability to quickly process order types affected by a change event.

BellSouth Response

BellSouth will recommend during the next Electronic Interface Change Control Process, EICCP, workshop scheduled for 2/16-2/17 that the EICCP scope be expanded to include the following:

- BellSouth- and CLEC-initiated Defect Change Requests, both documentation and software that are CLEC-affecting
- BellSouth-initiated enhancement requests that are CLEC-affecting. (CLEC-initiated enhancements are already included as a component of the existing process).
- Oversight of BellSouth's Escalation and Defect Notification processes

¹ In the case of LEO Implementation Guide, Volume 1, Issue 7K, although the Web site's stated posting date reflects October 27, 1999, the document was actually available there on November 1, 1999. A CLEC would, therefore, have realized an actual notification interval of four days.

- Formalized Escalation and Defect Notification processes, as well as define how the new processes will be incorporated into the existing EICCP structure.

-
A follow-up conference call is scheduled for February 29th to answer questions raised in the workshop. We do not have firm dates when the above items will be implemented but will operate within the framework of the current EICCP process which requires approval from the steering committee, comprised of BellSouth and CLEC representatives, prior to adopting changes.

BellSouth is also in the process of completing the following:

- Posting a notification letter by 2/18/00 advising CLECs of our intervals for providing advance notice of planned software and documentation changes.
- Developing a website by 3/1/00 where we will post unplanned system outages.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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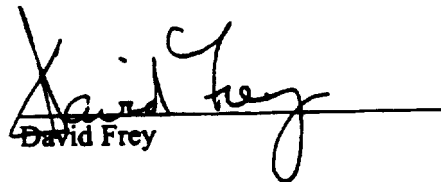
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